

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
) CC Docket 95-116
Telephone Number Portability)
Phase I Implementation.)

PETITION FOR WAIVER

The Sprint Local Telephone Companies hereby request a waiver, pursuant to Section 1.3 of the Commission's rules,¹ of the requirement to provide local number portability in the Minneapolis MSA by March 31, 1998. The specific offices impacted by this request are listed in Attachment A appended hereto.

In its First Memorandum Opinion and Order on Reconsideration,² the Commission modified the schedule for deployment of long-term number portability ("LNP") for Phases I and II. As a result of that Order, Phase I implementation – encompassing the Chicago, Houston and Minneapolis MSAs – is to be completed no later than March 31, 1998. The Commission also directed those companies not able to meet the March 31st deadline to file a waiver request no later than January 29, 1998.

On January 28, 1998, the Commission's Common Carrier Bureau issued an order extending the deadline for the filing of waiver requests until March 1, 1998.³ This extension is, however, only applicable to those situations in which the deployment schedule cannot be met due to vendor failure to provide a stable platform to support local number portability. It is for this reason alone that the Sprint LECs must now request an extension of time in which to deploy permanent local number portability in

¹ 47 C.F.R. Section 1.3.

² In the Matter of Telephone Number Portability, First Memorandum Opinion and Order on reconsideration, CC Docket 95-116, released March 11, 1997.

³ As March 1, fell on a Sunday, this petition is filed the first business day following that Sunday. See 47 C.F.R. Section 1.4(j).

the Minneapolis MSA. The specific offices impacted are listed on Attachment 1 appended hereto.


As the Commission is aware, the vendor engaged to supply the Number Portability Administration Center ("NPAC") in the Minneapolis areas has failed to comply with the terms of its contract and has, therefore, been dismissed. While another experienced vendor has been employed and is working quickly to supply the needed LNP platform, the delay caused by the original vendor's actions will, unfortunately, make it impossible for Sprint to meet the March 31st implementation deadline. However, Sprint stresses that the remainder of its systems are in place and thus it will be ready to provide LNP as soon as the vendor's work is completed, the NPAC is in place and testing has been successfully performed. It is Sprint's understanding that the NPAC will be ready on May 11th. Sprint estimates that it will require four weeks for testing and thus can begin implementation by June 8th. Based on industry discussions, it is expected that implementation will be phased in rather than flash-cut on a date certain; as such, Sprint expects its service to be rolled-out between June 8th and July 13th.

Section 1.3 of the Commission's rules states that the Commission may waive any provision of its rules if good cause is shown. Good cause is shown through the existence of special circumstances that warrant deviation from the general rule and such deviation will service the public interest. Sprint submits that special circumstances exist in this instance. Factors outside of Sprint's control, specifically the vendor's failure to perform its task in a timely manner and the resulting need to engage a new vendor toward the end of the Phase I implementation period, are the sole reasons for Sprint's inability to comply with the Commission's LNP deployment schedule. Because Sprint is otherwise prepared to deploy NLP, the public interest will be served, even with the grant of this waiver request, since it will introduce LNP to the

Minneapolis MSA as soon as possible after the NPAC-ready date. As noted above, it is expected that the service will be activated between June 8th and July 13th.

Based on the foregoing reasons, Sprint respectfully requests a waiver of the March 31, 1998 deadline for deployment of LNP in the Minneapolis MSA.

Respectfully submitted,
SPRINT CORPORATION

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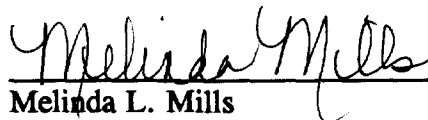
March 2, 1998

**ATTACHMENT A
 LNP SWITCH LIST**

MSA	EXCHANGE	SELECTED	LOCATION ROUTING NUMBER (LRN)	READY TO PORT DATE
MINNEAPOLIS	OSSEO	YES	612-315-0000	3/31/1998
MINNEAPOLIS	CHASKA	YES	612-361-0000	3/31/1998
MINNEAPOLIS	MAPLE GROVE	YES	612-416-0000	3/31/1998
MINNEAPOLIS	COLOGNE	YES	612-466-0000	3/31/1998
MINNEAPOLIS	ROGERS	YES	612-428-0000	3/31/1998
MINNEAPOLIS	ST. MICHAEL	YES	612-497-0000	3/31/1998
MINNEAPOLIS	VICTORIA	YES	612-443-0000	3/31/1998
MINNEAPOLIS	WACONIA	YES	612-442-0000	3/31/1998
MINNEAPOLIS	BROOKLYN PARK	NO		
MINNEAPOLIS	COKATO	NO	320-286-0000	
MINNEAPOLIS	HOWARD LAKE	NO	320-543-0000	
MINNEAPOLIS	NORTH INDUSTRIAL PK	NO		
MINNEAPOLIS	NORWOOD	NO	612-467-0000	
MINNEAPOLIS	WEAVER LAKE	NO		
MINNEAPOLIS	HASTINGS	YES	612-437-0000	911 only

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 2nd day of March 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Petition for Waiver" of the Sprint LTCs in the Matter of Telephone Number Portability Phase I Implementation, CC Docket No. 95-116, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.


Melinda L. Mills

* Indicates Hand Delivery

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